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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARTA ESTRADA, BENJAMIN MEJIA,

CASE NO.:

Plaintiffs.

COMPLAINT IN NEGLIGENCE

vs.

DEMAND FOR JURY TRIAL

DEPARTMENT OF THE NAVY, UNITED
STATES OF AMERICA, and DOES 1 to 20,
Inclusive,

Defendants. ____

Comes now, through undersigned counsel, Plaintiffs MARTA ESTRADA, former wife of/and BENJAMIN MEJIA, for their Complaint against defendants, THE DEPARTMENT OF THE NAVY, UNITED STATES OF AMERICA, and DOE DEFENDANTS 1-25 state and alleges the following:

1. This Honorable Court has original jurisdiction pursuant to 28 U.S.C. § 1346, since this matter is a civil action for money damages against the United States of America, and/or one

1 of its federal agencies, and/or one of its employees, for personal injury. Further, this claim has
2 been submitted for administrative adjustment, and more than six (6) months have elapsed with
3 no resolution or denial of the claim.

4 2. Venue is proper in this district pursuant to 28 U.S.C. §1391.

5 3. Plaintiffs MARTA ESTRADA and BENJAMIN MEJIA are adult residents of San
6 Bernardino County, California.

7 4. Defendants DEPARTMENT OF THE NAVY, UNITED STATES OF AMERICA
8 (hereinafter "Defendant NAVY") is composed of the executive part of the Department of the
9 Navy and is a Department within the Department of Defense. The Department of Defense is an
10 executive department of the UNITED STATES OF AMERICA.

11 5. DOE DEFENDANTS 1-25 are sued herein under fictitious names for the reason
12 that, despite diligent and good faith efforts to obtain information, their true names and identities
13 are presently unknown to Plaintiffs, but in some manner presently unknown to Plaintiffs they are
14 or were engaged in the activities alleged and/or were in some manner responsible for the injuries
15 and/or damage to Plaintiffs and/or in some manner are jointly liable with one or more of the
16 other parties to this action. Counsel for Plaintiff have diligently attempted to discover the
17 identities of these defendants by reviewing documents from Plaintiff and communicating with
18 Plaintiff. The identities may be disclosed by discovery and Plaintiff reserves the right to identify
19 DOE DEFENDANTS at that time.

20 6. On or about July 12, 2021, Plaintiff ESTRADA, then legally married to MEJIA,
21 was involved in a motor vehicle accident with a vehicle on the 215 Freeway in Riverside,
22 California whereby Alejandro Arreola, an employee of Defendant NAVY made an unsafe and
23 negligent lane change in violation of California Vehicle Code §22107, among other negligent
24 acts, colliding with Plaintiff's vehicle, causing significant personal injury to MARTA
25 ESTRADA, including but not limited to positive and serious injuries revealed in MRI testing
26 with disc protrusions and bulges to her lumbar and cervical spine requiring epidural steroid
27 injections, and over \$100,000 in medical bills to date. The impact caused approximately \$9600
28 in damage to ESTRADA'S vehicle, and costing MEJIA over \$18,000 in additional costs to

1 support his injured then spouse MARTA ESTRADA. Significantly, MARTA ESTRADA'S
2 injuries, which left her in constant pain, completely changed the couple's lives. Hence, both
3 ESTRADA and MEJIA have thus suffered a loss of consortium that has led to their divorce.

4 7. ESTRADA'S injuries have left her in constant pain and have completely changed
5 the couples' lives. ESTRADA and MEJIA have thus sustained damages in the form of loss of
6 consortium, loss of service, and loss of society which has diminished and/or deprived them from
7 any benefit which heretofore existed between these former spouses, including loss of love and
8 affection, care, attention, companionship, comfort, protection, sexual relations, among other
9 losses to be shown at the trial of this matter, and they are entitled to a sum to be determined by
10 this Honorable Court.

11 WHEREFORE, Plaintiffs MARTA ESTRADA and BENJAMIN MEJIA request the
12 following:

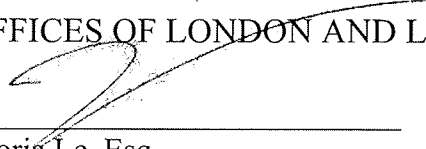
13 A. Judgment be entered in favor of Plaintiffs and against Defendants, jointly and
14 severally, for damages in an amount to be determined at trial, including but not limited to
15 special, general and consequential damages,

16 B. Costs, and that

17 C. The Court award Plaintiffs such other and further relief as it deems just and
18 equitable.

19 DATED: July 23, 2024
20 San Marino, CA

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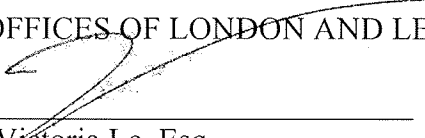
21 By: 
22 Victoria Le, Esq.
23 Attorney for Plaintiffs
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DEMAND FOR JURY TRIAL

Plaintiffs MARTA ESTRADA and BENJAMIN MEJIA hereby demand trial by jury.

DATED: July 23, 2024
San Marino, CA

LAW OFFICES OF LONDON AND LE

By: 
Victoria Le, Esq.
Attorney for Plaintiff